

IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS  
COUNTY DEPARTMENT

Sillierine Bennett, )  
                        )  
Plaintiff,         )  
                        )  
                        )  
v.                     ) JURY TRIAL DEMANDED  
                        )  
Community & Economic Development )  
                        )  
Association of Cook County, Inc. (CEDA), )  
                        )  
Defendant.          )

2013 NOV 26 PM 10:00  
CIRCUIT COURT OF COOK COUNTY  
CLERK'S OFFICE  
120 N. WABASH AVE.  
CHICAGO, IL 60602  
CALENDAR ROOM #  
TIME 10:00 AM  
T-BEST WIRE SERVICE

Demand  
\$300,000.00 (11)

**COMPLAINT**

Plaintiff in this matter, do hereby compose this document as a formal and civil complaint against the Defendant known as the Community and Economic Development Association of Cook County Inc, (CEDA) as follows:

**COMPLAINT CAUSE PARTIES and JURISDICTION**

1. Plaintiff seeks to file this course of action within the Circuit Courts of Cook County, Illinois to charge Defendant CEDA with violation of Plaintiff's employment rights as an employee of age by Defendant CEDA and under the Illinois Human Rights Act, 775 ILCS Section 5/1-101 et. Seq., of unlawful age discrimination and retaliation in the Defendant CEDA manner used to terminate Plaintiff as a long-term and tenured employee of CEDA.
2. Plaintiff is and remains a life-long resident of Ford Heights, Illinois and was employed by CEDA for more than three decades beginning in 1971 -1983 serving in multiple positions from support staff to supervisory roles of responsibility.
3. Plaintiff was rehired and employed by CEDA in January of 1989 as a Housing Coordinator to assist and salvage a stressed Housing Counseling Program. Plaintiff remained employed

Continue page 2

by Defendant, CEDA up and through Plaintiff's termination on January 3, 2011, by Defendant CEDA after more than 35 years of employment.

4. Plaintiff's complaint arose as a result of Plaintiff being termination by former employer, Defendant, the Community and Economic Development Association of Cook County, Inc. (CEDA) by the Agency Director, who hand delivered a formal notice of lay off to Plaintiff at Plaintiff's regular work site at the CEDA Bloom Rich located at 1647 Cottage Grove Avenue, Ford Heights, Illinois, 60411 on January, 3, 2011; Defendant CEDA's local community development area main office was and remains at 1203 West End Avenue, Chicago Heights, Illinois, 60411; with Central Executive Office located at 208 South LaSalle Street, Suite 1900, Chicago, Illinois 60604. (**Exhibit A -Termination Letter**)
5. Plaintiff was made aware of a job posted on CEDA's website for the position of Central Intake Specialist with a post closing date of January 21, 2011. This was a position of which Plaintiff had previously performed at the local site prior to termination for more than a year. (**Exhibit-B Job Position Posting**)

Plaintiff contacted Agency Director to inquire about the available position on January 14, 2011, to be told that it had already been filled on January 14, 2011. The Agency Director suggested that Plaintiff contact CEDA Central's Human Resource Department, who stated to refer Plaintiff back to Agency Director who referenced, "that was not Agency Director's responsibility". Plaintiff contacted Agency Director again to be told by Agency Director "it was out of Agency Director's hands and it was the Grant Manager's decision to hire the younger person". Agency Director then suggested Plaintiff call the CSBG Grant Manager, who writes to manage, distribute and makes decisions about the use of Community Services Block Grant (CSBG) funds and program activities. (**Exhibit C-IDHR Fact Finding Statement by Director of CEDA Human Resource Department**).

6. After Plaintiff had suffered through several weeks of emotional stress cause by Defendant CEDA and due to Defendant CEDA actions to terminate Plaintiff who was older than with experience than younger employees retained by Defendant CEDA as cause for this claim.
7. Plaintiff then applied to Defendant, CEDA through CEDA's web site for the available position of Central Intake Specialist. Plaintiff followed the instructions as stated and emailed to forward Plaintiff's resume to CEDA on January 21, 2011 before the close of the posting. (**Exhibit D-Email- Plaintiff Submission of Job Application to CEDA**).

Continue page 3

**AGE DISCRIMINATION CAUSE**

8. Plaintiff was born on February 9, 1950 and is within the protected age category of the Illinois Human Rights Act (IHRA)and the Age and Employment Discrimination Act (AEDA)
9. Defendant, CEDA an employer under the Illinois Human Rights employs several hundred employees and is a large multi-social service agency operating in a regional capacity to provide programs and services to individuals and families of suburban Cook County and specific areas of metropolitan Chicago. (See Exhibit- CEDA Agency Annual Profile)
10. Plaintiff was employed by Defendant CEDA from 1989 and held multi positions to include supervision roles until Plaintiff's termination on January 3, 2011 in the position of Program Specialist.
11. Plaintiff, on May 4, 2011, filed formal complaints of age discrimination and retaliation with the Illinois Department of Human Rights (**IDHR**) under the Illinois Human Rights Act 775 ILCS Section 5/1-101 ET. Seq and was assigned a case number **2011CA3266** ; and consequently IDHR forward to case was established the same with **EEOC -21BA11609**. Case filed with IDHR was Case was dismissed on August 8, 2012, for lack of substantial evidence. (**Exhibit E-1 IDHR Charge Letter; Exhibit E-2 EEOC Charge Letter .**
12. Plaintiff on May 4, 2011simoutaineouly filed formal complaints with the Cook County Commission On Human Rights (COHR) case **2011E0017**of which case is pending final investigation by IDHR). ( **Exhibit E-3 Charge Letter/Right to Sue )**
13. Plaintiff later discovered that Defendant, CEDA had retained several younger employees in similar positions as that of Plaintiff and hired an employee younger than Plaintiff for the available position of Central Intake Specialist thus citing differences of performance evaluations over experience and tenure between the younger employee who was retained and Plaintiff was terminated.
14. Defendant, CEDA did not require the younger employee to apply for the job position in the same hiring process as Plaintiff and over 100 additional applicants per the job posting and in accordance with Defendants, CEDA's own personnel policies and hiring practices.
15. Plaintiff now petitions this court's jurisdiction to hear Plaintiff's claim of unlawful age discrimination and retaliation under the Illinois Human Rights Act 775 ILCS Section 5/1-101 ET. Seq., to request relief in the form of reasonable compensation of losses.

Continue page 4

## **RETALIATION**

- 16 Plaintiff had previously filed a case of retaliation with the Illinois Department of Human Rights in 2003, that which was closed and resolved in discovery and through mediations by IDHR.; of which Plaintiff was within a protected class status.
17. On April 11, 2009, Plaintiff was directed to take a two week unpaid leave of absences for desiring to participate in a civic election. Plaintiff was singled out as an employee while other employees were not. During this period plaintiff began to experience poor performance evaluations from supervisor, Agency Director with direction by the Director of CEDA's Human Resource Department, which was not a practice by Defendant CEDA to have the Human Resource Director to be directly involved with support staff evaluations.
18. On March 26, 2009, Plaintiff initiated letter to CEDA's CEO in compliance due to the lack of response from Human Resource Director and Agency Director as to file a formal grievance of retaliation regarding participation in a civic election to CEDA's Department of Human Resources in March of 2009; it was suppressed with a telephone call from an independent attorney representing, Plaintiff, with a non-satisfactory response from Defendant, CEDA or its agents. (**Exhibit F- Plaintiff 2009 Letter to CEO Re: Mandatory unpaid Leave of Absence.**) .
19. Plaintiffs began to experience severe reductions in the quality of Plaintiff's performance evaluations, in 2009 and 2010 as a result to the above allegations and were treated different than younger employees in similar position with simulated job responsibilities. Plaintiff was unfairly treated and was given more work assignments than was younger employees in similar positions to be performed with outdated and obsolete equipment requiring frequent maintenance.
20. Plaintiff was not given any consideration for the available position of Central Intake Specialist by CEDA or its agents, who was more qualified with greater experience than the younger employee who was hired by CEDA for said position.
21. Defendant, CEDA further gave preference to allow the younger employee hired for the Central Intake Specialist position by granting submission of application to be directly given to Grants Manager. **Reference Item 5. (Exhibit C-IDHR Fact Finding Statement by Director of CEDA Human Resource Department).**

Continue page 5

22. Defendant unfairly failed to retain or offer to promote Plaintiff to other available positions within Dependent CEDA' agency as did Defendant with younger employees working in similar job positions with less experienced,
23. Defendant CEDA willfully and knowingly sought to retain and or transfer several younger employees to available positions after Plaintiff had been terminated by Defendant CEDA.
24. Plaintiff suffered a loss of job, wages, benefits, future retirement and an accumulation prescriptions, and medical expenses for out- patient and hospital stay due to emotional stress.

**DEMAND FOR RELIEF**

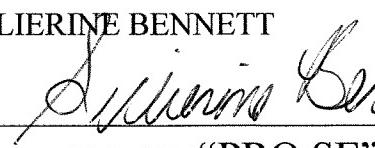
Plaintiff now prays for the following:

- A, To prevent Defendant CEDA from further acts of age discrimination against Plaintiff and its employees;
- B. Plaintiff, seeks compensation for damages and claims of loss of job, wages, lost benefits, lost sick and vacation days, and lost retirement benefits.
- C. Plaintiff seeks compensation damages in an appropriate amount designated by this Court
- D, Plaintiff seeks reimbursement of out of pocket prescriptions and medical and expenses for incurred for hospital stay due to emotional stress to include any associated attorney fees and court cost should an attorney be retained to represent Plaintiff in this action.

PLAINTIFF DEMANDS OF TRAIL BY JURY.

Respectfully submitted by Plaintiff

,  
SILLIERINE BENNETT

BY  11-26-12  
Plaintiff / "PRO SE"

Sillierine Bennett  
1449 Greenwood Avenue  
Ford Heights, Illinois, 60411  
(708) 692-3562

Sillierene Bennett  
vs  
CEDA



Community and Economic Development Association of Cook County, Inc.  
208 S. LaSalle Street, Suite 1900, Chicago, Illinois 60604  
312/795-8800 • Fax 312/795-1034  
[www.cedaorg.net](http://www.cedaorg.net)

Exhibit A

## Memo

**To:** Sillierene Bennett  
**From:** Karyn Perkins  
**C:** Pat Doherty-Wildner, Yvonne Butchee, Regina Salazar  
**Date:** January 3, 2011  
**Subject:** CSBG Reduction in Force

---

For the upcoming program year, beginning January 1, 2011, there will be a change in the funding for the Community Services Block Grant and there will be changes in our service delivery through Ford Heights and the Bloom Rich Community Development Area.

As a result of these changes, your position will be eliminated and your last day of employment with CEDA will be Monday, January 3, 2011. You will be paid through January 14, 2011, in lieu of notice and will receive payment for earned unused vacation pay for the current year.

You will meet with Regina Salazar, Manager, Human Resources to discuss your separation, final pay and benefit options and eligibility and to conduct an exit interview. You will need to return all CEDA property (door keys, cabinet keys, desk keys, ID card, electronic key card, cell phone, computer equipment or any other CEDA property) All of these items can be returned to Regina during that meeting.

You may apply for any open positions that are of interest to you for which you are qualified. You will be considered for the open positions you apply for based on your qualifications for those positions.

CEDA thanks you for your contributions and your time with us. We wish you well in the future.

Please be aware that the Employee Assistance Program remains available to you as a confidential benefit and resource. It is available to former employees and their families to provide help through counseling, training and referral to learn to cope more effectively with any personal problems that may be affecting the individual's work performance. You may contact the EAP confidentially at 1-800)327-5071 and can visit their site at [www.wseap.com](http://www.wseap.com).



Community and Economic Development Association of Cook County, Incorporated

*Exhibit B-1*

## EMPLOYMENT OPPORTUNITIES

CEDA will only accept resumes and applications for open authorized or listed positions within the time frame indicated for each position. Unsolicited resumes and resumes received after the closing date for a position will not be considered or retained. Applicants must clearly and specifically identify the position for which they are applying. We appreciate your interest in CEDA.

It is the policy of the Community and Economic Development Association, Inc. to implement affirmatively equal opportunity to all qualified employees and applicants for employment without regard to race, creed, color, age, sex, national origin, or physical handicap, and positive action shall be taken to ensure the fulfillment of this policy. Also included in this policy are veterans of the United States military.

**Job Title:** Central Intake/Referral Specialist

**PA#:** 1101

**Location:** Various CDAs – Suburban Cook County, IL  
(*Chgo. Hghts.; Cicero; Evanston; Robbins*)

**Department:** CSBG (Community Services Block Grant) Program

**Description:**

Position maintains responsibility for intake, management, referral, follow-up and orientation for all CSBG ARRA program participants. Populations served include individuals in need of employment, housing, senior and disabled emergency relief services, vocational scholarships and REACH services. Responsible for data entry and report generation for ARRA CSBG participants via the Tracker database system. Secondary responsibilities include providing referrals, setting appointments and general orientation for CSBG programs and services (internal and external).

**Duties:**

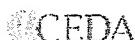
Include, but are not limited to, providing intake, assessment and referral for the ARRA CSBG programs at area CDA (Community Development Area); facilitating preliminary eligibility determination including assessment, referral and case management; providing clients with program information and eligibility requirements; assisting new participants to complete all intake paperwork and provide necessary documentation (e.g. SS cards, proof of residency/income etc.); facilitating orientation for program participants regarding program services; conducting data entry and management using the Tracker system; maintaining files and reporting systems as required by CSBG; acting as an informational/referral source for social services and economic development programs offered at CDA; setting appointments with CSBG and other program staff at designated CDA; providing follow-up with departments regarding referrals; facilitating both internal and external audit preparation; providing information for phone inquiries, maintaining a daily log; generating monthly reports to CDA Directors regarding referrals/follow-up; and attending trainings to gain knowledge regarding CEDA's services and eligibility requirements.

**Qualifications:**

High school graduate or equivalent, AA degree or higher preferred. Previous customer service experience required. Computer literate with proficiency with basic Microsoft Office software. Knowledge of and experience with diverse populations. Strong verbal/written communication skills; strong numerical aptitude. Bilingual candidates encouraged to apply.

**Closing Date:** January 21, 2011

*Interested Applicants should forward resumes to:*



Human Resources Dept.  
HR@cedaorg.net

CEDA is an Equal Opportunity Employer

Select Language  
Español | Français | English

Job Title: PA#: Location: Department: Closing Date:



Community and Economic Development Association of Cook County, Incorporated

Exhibit B-2

## EMPLOYMENT OPPORTUNITIES

CEDA will only accept resumes and applications for open advertised or listed positions within the time frame indicated for each position. Unsolicited resumes and resumes received after the closing date for a position will not be considered or retained. Applicants must clearly and specifically identify the position for which they are applying. We appreciate your interest in CEDA.

It is the policy of the Community and Economic Development Association, Inc. to implement affirmatively, equal opportunity to all qualified employees and applicants for employment without regard to race, creed, color, sex, age, national origin, or physical handicap, and positive action shall be taken to ensure the fulfillment of this policy. Also included in this policy are veterans of the United States military.

### Employment Opportunities

Job Title:	PA#:	Location:	Department:	Closing Date:
Central Intake/ Referral Specialist	1101	Various CDAs – Suburban Cook County, IL (Chicago, Hights; Cicero; Evanston; Robbins)	CSBG (Community Services Block Grant) Program	January 21, 2011
Director, Early Childhood Education (ECE)	1102	CEDA Central - Chicago, IL	Children and Family Services – Head Start	January 21, 2011
Teacher Assistant	1103	Ray Walker Head Start – Schaumburg, IL	Children and Family Services – Head Start	January 21, 2011

Witness Statement Form

Exhibit C

Re: Charge No.: 11ICA 3266 182

Complainant: Sillierine Bent Respondent: CEDA

Witness Name: Jake Koepsel EEO Category: 12051

Witness Address: C/O RP

Telephone Number: \_\_\_\_\_

Title/position of witness: DIR-HR

(e.g. witness worked with Complainant as a packer on the same assembly line, same shift.)

Interviewed witness by  telephone      in person

Date: 8/9/12 Time: 9:45

Location (if in person): \_\_\_\_\_

Indicated below are the relevant facts obtained from above named witness (continued on attached lined paper if more space needed.)

my Dept handles submissions  
for posted vacancies &  
generated applicant flow log.

Flow log represents resumes  
received in HR during posting  
period. Capture + send log  
to Mktg mg R.

Appears LJ submitted resume  
directly to Yvonne Butcher  
Both CP + LA worked in program

DSB

Investigator

#14 Witness Statement 07/08

Date

8/11/12

YB managed. She had knowledge  
of perf of both Service Delivery

**From:** sillierine bennett (sillbennett@yahoo.com)  
**To:** HR@cedaorg.net;  
**Date:** Fri, January 21, 2011 12:37:02 PM  
**Cc:**  
**Subject:** Employment Opportunity Request

*Exhibit D*

Dear Sir/Madam:

My name is Sillierine Bennett, I am a former employee of CEDA who was recently laid off seeking any position available. I am submitting my resume to apply for the posted positions of Central Intake/Referral Specialist within the CEDA sites listed with a closing date of January 21, 2011.

I have attached my resume per the web site instructions.

Thanking you in advance for your sincere consideration.

**CHARGE OF DISCRIMINATION**

This form is affected by the Privacy Act of 1974: See Privacy act statement before completing this form.

#11W0504.10

AGEN

 IDHR EEOC

CHARGE NUMBER

2011CA3266

Illinois Department of Human Rights and EEOC

Exhibit E

NAME OF COMPLAINANT (indicate Mr. Ms. Mrs.) <b>Ms. Sillierine Bennett</b>		TELEPHONE NUMBER (include area code) <b>(708) 692-3562</b>	
STREET ADDRESS <b>1449 Greenwood</b>	CITY, STATE AND ZIP CODE <b>Ford Heights, IL 60411</b>	DATE OF BIRTH <b>02/09/1950</b>	M D YEAR
NAMED IS THE EMPLOYER, LABOR ORGANIZATION, EMPLOYMENT AGENCY, APPRENTICESHIP COMMITTEE, STATE OR LOCAL GOVERNMENT AGENCY WHO DISCRIMINATED AGAINST ME (IF MORE THAN ONE LIST BELOW)			
NAME OF RESPONDENT <b>Community &amp; Economic Development Association d/b/a CEDA</b>	NUMBER OF EMPLOYEES, MEMBERS <b>15+</b>	TELEPHONE NUMBER (include area code) <b>(312) 795-8000</b>	
STREET ADDRESS <b>208 S. LaSalle Street, Suite 1900</b>	CITY, STATE AND ZIP CODE <b>Chicago, IL 60604</b>	COUNTY <b>Cook</b>	
CAUSE OF DISCRIMINATION BASED ON: <b>Age      Retaliation      Physical Disability</b>		DATE OF DISCRIMINATION EARLIEST (ADEA/EPA) LATEST (ALL) <b>01/03/2011      01/21/2011</b>	
		<input type="checkbox"/> CONTINUING ACTION	

## THE PARTICULARS OF THE CHARGE ARE AS FOLLOWS:

**I. A. ISSUE/BASIS****LAY OFF – JANUARY 3, 2011, BASED ON MY AGE, 60****B. PRIMA FACIE ALLEGATIONS**

1. My age at the time of the alleged harm was 60.
2. I began my employment with Respondent in 1989. My work performance as CSBG Program Coordinator/Specialist, met Respondent's legitimate expectations.

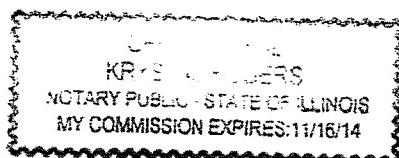
Page 1 of 5

I also want this charge filed with the EEOC. I will advise the agencies if I change my address or telephone number and I will cooperate fully with them in the processing of my charge in accordance with their procedures.

SUBSCRIBED AND SWORN TO BEFORE ME

THIS 4th DAY OF May, 2011

NOTARY SIGNATURE



NOTARY STAMP

X Aurora Bennett SIGNATURE OF COMPLAINANT

5-4-11 DATE

I declare under penalty of perjury that the foregoing is true and correct I swear or affirm that I have read the above charge and that it is true to the best of my knowledge, information and belief.

## EQUAL EMPLOYMENT OPPORTUNITY COMMISSION

Exhibit E-2

BENNETT SILLIERINE

Versus

COMMUNITY &amp; ECONOMIC DEVE

PERSON FILING CHARGE BENNETT SILLIERINE	
THIS PERSON (check one)	
<input type="checkbox"/>	CLAIMS TO BE AGGRIEVED
<input type="checkbox"/>	IS FILING ON BEHALF OF ANOTHER
DATE OF ALLEGED VIOLATION <i>Earliest</i> <i>Most Recent</i>	
PLACE OF ALLEGED VIOLATION	
EEOC CHARGE NUMBER                    21BA11690	
DHR Charge Number                    2011CA3266	

NOTICE OF CHARGE OF DISCRIMINATION IN JURISDICTIONS WHERE A FEP AGENCY WILL INITIALLY PROCESS  
(See EEOC "Rules and Regulations" for additional information)

YOU ARE HEREBY NOTIFIED THAT A CHARGE OF EMPLOYMENT DISCRIMINATION UNDER

- Title VII of the Civil Rights Act of 1964                             The Americans with Disabilities Act
- The Age Discrimination in Employment Act of 1967 (ADEA)

HAS BEEN RECEIVED BY

The EEOC and sent for initial processing to \_\_\_\_\_  
(FEP Agency)

The Illinois Department of Human Rights and sent to the EEOC for dual filing purposes.  
(FEP Agency)

While EEOC has jurisdiction (upon expiration of any deferral requirement if this is a Title VII or ADA charge) to investigate this charge, EEOC may refrain from beginning an investigation and await the issuance of the Agency's final findings and orders. These final findings and orders will be given weight by EEOC in making its own determination as to whether or not reasonable cause exists to believe that the allegations made in the charge are true.

You are therefore encouraged to cooperate fully with the Agency. All facts and evidence provided by you to the Agency in the course of its proceedings will be considered by the Commission when it reviews the Agency's final findings and orders. In many instances the Commission will take no further action, thereby avoiding the necessity of an investigation by both the Agency and the Commission. This likelihood is increased by your cooperation with the Agency.

As a party to the charge, you may request that EEOC review the final decision and order of the above named Agency. For such a request to be honored, you must notify the Commission in writing within 15 days of your receipt of the Agency's final decision and order. If the Agency terminates its proceedings without issuing a final finding and order, you will be contacted further by the Commission. Regardless of whether the Agency or the Commission processes the charge, the Recordkeeping and Non-Retaliation provisions of the statutes as explained in the "EEOC Rules and Regulations" apply.

For further correspondence on this matter, please use the charge number(s) shown.

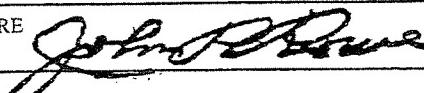
An Equal Pay Act investigation (29 U.S.C. (d)) will be conducted by the Commission concurrently with the Agency's investigation of the charge.

Enclosure: Copy of Charge

## BASIS OF DISCRIMINATION

See Copy of Charge

## CIRCUMSTANCES OF ALLEGED VIOLATION:

DATE May 16, 2011	TYPED NAME/TITLE OF AUTHORIZED EEOC OFFICIAL John P. Rowe, District Director	SIGNATURE 
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**STATE OF ILLINOIS  
DEPARTMENT OF HUMAN RIGHTS**

IN THE MATTER OF: )  
Sillierine Bennett )  
Complainant, ) Charge No.: 2011CA3266  
and ) EEOC No.: 21BA11690  
CEDA )  
Respondent. )

**NOTICE OF ADMINISTRATIVE CLOSURE**

TO: Sillierine Bennett CEDA  
1449 Greenwood C/o Joel F. Handler  
Ford Heights, IL 60411 Attorney At Law  
55 West Wacker Drive  
Suite 950  
Chicago, IL 60601

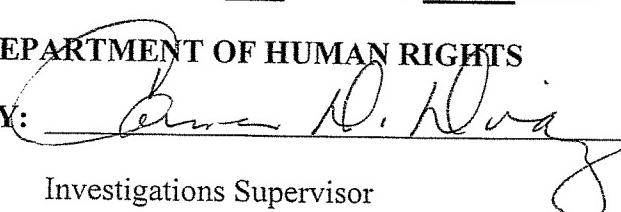
Charge Number 2011CA3266 having been filed with the Department of Human Rights by Complainant against Respondent, and Complainant having submitted a written request to withdraw the following parts of this charge pursuant to the Department's Rules and Regulations:

Layoff and failure to rehire on the basis of physical disabilities, Asthma and Carpal Tunnel Syndrome

You are hereby NOTIFIED that Complainant's request to withdraw is approved and that the parts of the charge specified above are hereby administratively closed. The Department will take no further action with regard to these allegations. All remaining allegations shall continue to be processed in accordance with the Department's Rules and Regulations.

**ENTERED THIS 12<sup>th</sup> DAY OF March 2012.**

**DEPARTMENT OF HUMAN RIGHTS**

BY:   
Investigations Supervisor

PARTCLOS  
07/08

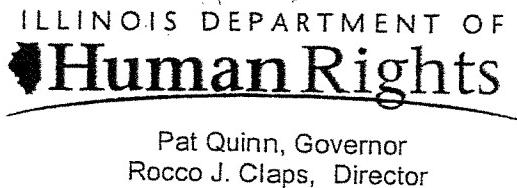


Exhibit  
E-3

MARCH 31, 2012

SILLIERINE BENNETT  
1449 GREENWOOD  
FORD HEIGH, IL 60411

RE: CHARGE NO.: 2011-CA-3266  
RESPONDENT: COMMUNITY & ECONOMIC DEVE  
COMPLAINT OR CIVIL ACTION FILING DATES: 08/02/12 THROUGH 10/30/12

Dear Complainant,

You have the right to file a complaint with the Human Rights Commission or commence a civil action in the appropriate circuit court, if the Department of Human Rights (DHR) has not completed your case by issuing its report of findings within 365 days from the date you filed your PERFECTED signed and notarized charge or within any extension of that time to which you and the Respondent have agreed in writing.

Within 90 days of the expiration of the 365 days or extension (see above paragraph), if you so choose, you may file a complaint with the Human Rights Commission or commence a civil action in the appropriate circuit court. We have calculated the time above (see Complaint or Civil Action Filing Dates). While we have made this calculation with the best of intentions, errors can occur. The Commission has ruled that it is your responsibility to count the number of days properly. If you file a complaint or commence a civil action in circuit court outside this 90-day period, the Commission may dismiss your complaint; or, your civil action may be deemed untimely.

Once 455 days (or the extended time) have passed, DHR must dismiss your charge with prejudice without any further right to proceed if you have not filed a complaint with the Commission, or commenced a civil action in the appropriate circuit court. Therefore, you may wish to contact an attorney to decide the best way for you to handle your case. If you file a complaint with the Human Rights Commission, the form of the complaint must be in accordance with Section 7A-102(F) of the Human Rights Act. You must serve a copy of the complaint filed with the Human Rights Commission on DHR, on the same day that you file a complaint with the Commission. The Commission will then schedule a hearing for your case before an Administrative Law Judge. If you have any questions about filing a complaint with the Commission, you should call (312) 814-6268 or 814-6269. If you commence a civil action in a circuit court, the form of the complaint must be in accordance with the Illinois Code of Civil Procedure. If you file a complaint with the Human Rights Commission, you may not later commence a civil action in circuit court.

cc: Joel F. Handler, Attorney

1509 HBLTR  
12/2010

**From:** sillierine bennett (sillbennett@yahoo.com)  
**To:** rwharton@cedaorg.net; jkoespel@cedaorg.net; Kperkins@cedaorg.net;  
**Date:** Thu, March 26, 2009 4:09:26 PM  
**Cc:**  
**Subject:** From Sillierine Bennett Political Candidacy Status

*Exhibit F*

Dear Mr. Wharton,

The attached letter is sent on my behalf to further communicate my previous concerns regarding my intent to run for an elective office relative to my position as a staff member within CEDA.

Please feel free to contact me at any time at my personal cell number (708) 692-3562.

Respectfully Submitted,

Sillierine Bennett

## Civil Division Action Cover Sheet

IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS  
FIRST MUNICIPAL, CIVIL DIVISIONSillierine Bennett

Community and Economic Development Association of Cook County  
(CEDA)

Plaintiff

Defendant

No.

Jury Demand  yes  no

## CIVIL ACTION COVER SHEET

A Civil Action Cover Sheet shall be filed with the complaint in all civil actions. The information contained herein is for administrative purposes only and cannot be introduced into evidence. Please check the box of the appropriate general category which best characterizes your action.

Civil Case (A)

- 0007 Confession of Judgment
  - 0008 Replevin
  - 0017 Detinue
  - 0031 Foreign Judgment
- Filing Out of State/Out of Country
- 0054 Registration of Administrative Judgment

Tort/Personal Injury Case

Any wrong or damage done to another person, such as, physical pain, illness, or any impairment of physical condition resulting from the careless or negligent actions of others. The most common cases involve auto accident injuries.

- 0027 Personal Injury Motor Vehicle
- 0048 Dram Shop
- 0049 Product Liability
- 0057 Personal Injury Motor Vehicle Subrogation
- 0001 Personal Injury Other
- 0004 Tort-Intentional
- 0062 Property Damage

Commercial Litigation Case

(i.e. credit card agreements, any contract between two or more individuals)

- 0002 Breach of Contract
- 0071 Fraud
- 0074 Statutory Fraud

Atty. No.: \_\_\_\_\_

Pro Se 99500

Attorney (or Pro Se Petitioner): \_\_\_\_\_

Name: \_\_\_\_\_

By: \_\_\_\_\_

Attorney or Pro Se Litigant

Address: \_\_\_\_\_

City/State/Zip: \_\_\_\_\_

Telephone: \_\_\_\_\_

Civil Case (B)

- 0031 Filing an Illinois Court Judgment
- 0100 Petition for Discovery

A Petition to take depositions or subpoena records before a case is filed.

Civil Housing Case

(i.e. condominium conversion, conservation, demolition/objection to fast track, exterior walls/facades, fire protection; heat call (including Unincorporated Cook County), lead paint new developments, public places of amusement, strategic task force inspections, public nuisance)

- 0038 Housing
- 0088 Ordinance Violation
- 0086 Objection to Fast Track
- 0044 Criminal Ordinance Violation
- 0037 Heat Case

Pro Se Case Type

The Pro Se Court section of the Civil Division resolves disputes between parties where the amount at issue does not exceed \$3,000. The party may act as their own attorney. Forms can be completed at the Pro Se desk in Room 602.

- 0050 Pro Se (\$3,000 or less)

Eviction Case/Civil Forcible/CHA Forcible

A summary proceeding in which the landlord seeks to restore possession of the premises or payment of rent when the tenant has wrongfully withheld rent or possession of the premises.

- 0005 Forcible (possession only)
- 0006 Joint Action (possession and rent)
- 0018 Distress for Rent

IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS  
FIRST MUNICIPAL, CIVIL DIVISIONSillierine Bennett

Plaintiff

No.

Community and Economic Development  
Association of Cook County (CEDA)

Defendant

Jury Demand  yes  no

## CIVIL ACTION COVER SHEET

A Civil Action Cover Sheet shall be filed with the complaint in all civil actions. The information contained herein is for administrative purposes only and cannot be introduced into evidence. Please check the box of the appropriate general category which best characterizes your action.

Civil Case (A)

- 0007 Confession of Judgment
- 0008 Replevin
- 0017 Detinue
- 0031 Foreign Judgment
- Filing Out of State/Out of Country
- 0054 Registration of Administrative Judgment

Tort/Personal Injury Case

Any wrong or damage done to another person, such as, physical pain, illness, or any impairment of physical condition resulting from the careless or negligent actions of others. The most common cases involve auto accident injuries.

- 0027 Personal Injury Motor Vehicle
- 0048 Dram Shop
- 0049 Product Liability
- 0057 Personal Injury Motor Vehicle Subrogation
- 0001 Personal Injury Other
- 0004 Tort Intentional
- 0062 Property Damage

Commercial Litigation Case

(i.e. credit card agreements, any contract between two or more individuals)

- 0002 Breach of Contract
- 0071 Fraud
- 0074 Statutory Fraud

Atty. No.: \_\_\_\_\_

Pro Se 99500

Attorney (or Pro Se Petitioner):

Name: Sillierine BennettAddress: 1449 GreenwoodCity/State/Zip: Ford Heights, IL 60411Telephone: 708-692-3562Civil Case (B)

- 0031 Filing an Illinois Court Judgment
- 0100 Petition for Discovery

A Petition to take depositions or subpoena records before a case is filed.

Civil Housing Case

(i.e. condominium conversion, conservation, demolition/objection to fast track, exterior walls/facades, fire protection; heat call (including Unincorporated Cook County), lead paint new developments, public places of amusement, strategic task force inspections, public nuisance).

- 0038 Housing
- 0088 Ordinance Violation
- 0086 Objection to Fast Track
- 0044 Criminal Ordinance Violation
- 0037 Heat Case

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- 0005 Forcible (possession only)
- 0006 Joint Action (possession and rent)
- 0018 Distress for Rent

By:

Sillierine Bennett

Attorney or Pro Se Litigant

## Civil Action Cover Sheet - Case Initiation

(Rev. 4/21/09) CCL 0520

IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS  
COUNTY DEPARTMENT, LAW DIVISION

Sillierine Bennett

Community and Economic  
Development Association of Cook County  
INC. (CEDA)CIVIL ACTION COVER SHEET - CASE INITIATION

A Civil Action Cover Sheet - Case Initiation shall be filed with the complaint in all civil actions. The information contained herein is for administrative purposes only and cannot be introduced into evidence. Please check the box in front of the appropriate case type which best characterizes your action. ONLY ONE (1) CASE TYPE MAY BE CHECKED WITH THIS COVER SHEET.

Jury Demand  Yes  NoPERSONAL INJURY/WRONFUL DEATH

## CASE TYPES:

- 027 Motor Vehicle
- 040 Medical Malpractice
- 047 Asbestos
- 048 Dram Shop
- 049 Product Liability
- 051 Construction Injuries  
(including Structural Work Act, Road  
Construction Injuries Act and negligence)
- 052 Railroad/FELA
- 053 Pediatric Lead Exposure
- 061 Other Personal Injury/Wrongful Death
- 063 Intentional Tort
- 064 Miscellaneous Statutory Action  
(Please Specify Below\*\*)
- 065 Premises Liability
- 078 Fen-phen/Redux Litigation
- 199 Silicone Implant

TAX & MISCELLANEOUS REMEDIES

## CASE TYPES:

- 007 Confession of Judgment
- 008 Replevin
- 009 Tax
- 015 Condemnation
- 017 Detinue
- 029 Unemployment Compensation
- 036 Administrative Review Action
- 085 Petition to Register Foreign Judgment
- 099 All Other Extraordinary Remedies

No.

2012L013254  
CALENDAR/ROOM A  
TIME 00:00  
PI STATE MISC ACTION

CLERK OF CIRCUIT COURT	FILED B - 13
LAW DIVISION	2012 NOV 26 AM 10:39

(FILE STAMP)

COMMERCIAL LITIGATION

## CASE TYPES:

- 002 Breach of Contract
- 070 Professional Malpractice  
(other than legal or medical)
- 071 Fraud
- 072 Consumer Fraud
- 073 Breach of Warranty
- 074 Statutory Action  
(Please Specify Below\*\*)
- 075 Other Commercial Litigation  
(Please Specify Below\*\*)
- 076 Retaliatory Discharge

OTHER ACTIONS

## CASE TYPES:

- 062 Property Damage
- 066 Legal Malpractice
- 077 Libel/Slander
- 079 Petition for Qualified Orders
- 084 Petition to Issue Subpoena
- 100 Petition for Discovery

\*\* Age Discrimination Complaint

By:

Dorothy Brown, Clerk of the Circuit Court of Cook County, Illinois

(Pro Se)

DOROTHY BROWN, CLERK OF THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS



FILED 8-13  
NOV 26 AM 10:39  
2012  
CLERK OF CIRCUIT COURT  
LAW DIVISION

IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS  
COUNTY DEPARTMENT

Sillierine Bennett, )  
Plaintiff, ) 2012L013254  
v. ) CALENDAR/ROOM A  
Community & Economic Development ) TIME 00:00  
Association of Cook County, Inc. (CEDA), ) PI Stat Misc Action  
Defendant. )  
Demand  
\$ 300,000.00

**COMPLAINT**

Plaintiff in this matter, do hereby compose this document as a formal and civil complaint against the Defendant known as the Community and Economic Development Association of Cook County Inc, (CEDA) as follows:

**COMPLAINT CAUSE PARTIES and JURISDICTION**

1. Plaintiff seeks to file this course of action within the Circuit Courts of Cook County, Illinois to charge Defendant CEDA with violation of Plaintiff's employment rights as an employee of age by Defendant CEDA and under the Illinois Human Rights Act, 775 ILCS Section 5/1-101 et. Seq., of unlawful age discrimination and retaliation in the Defendant CEDA manner used to terminate Plaintiff as a long-term and tenured employee of CEDA.
2. Plaintiff is and remains a life-long resident of Ford Heights, Illinois and was employed by CEDA for more than three decades beginning in 1971 -1983 serving in multiple positions from support staff to supervisory roles of responsibility.
3. Plaintiff was rehired and employed by CEDA in January of 1989 as a Housing Coordinator to assist and salvage a stressed Housing Counseling Program. Plaintiff remained employed

Continue page 2

by Defendant, CEDA up and through Plaintiff's termination on January 3, 2011, by Defendant CEDA after more than 35 years of employment.

4. Plaintiff's complaint arose as a result of Plaintiff being termination by former employer, Defendant, the Community and Economic Development Association of Cook County, Inc. (CEDA) by the Agency Director, who hand delivered a formal notice of lay off to Plaintiff at Plaintiff's regular work site at the CEDA Bloom Rich located at 1647 Cottage Grove Avenue, Ford Heights, Illinois, 60411 on January, 3, 2011; Defendant CEDA's local community development area main office was and remains at 1203 West End Avenue, Chicago Heights, Illinois, 60411; with Central Executive Office located at 208 South LaSalle Street, Suite 1900, Chicago, Illinois 60604. (**Exhibit A -Termination Letter**)
5. Plaintiff was made aware of a job posted on CEDA's website for the position of Central Intake Specialist with a post closing date of January 21, 2011. This was a position of which Plaintiff had previously performed at the local site prior to termination for more than a year. (**Exhibit-B Job Position Posting**)

Plaintiff contacted Agency Director to inquire about the available position on January 14, 2011, to be told that it had already been filled on January 14, 2011 teh Agency Director suggested that Plaintiff contact CEDA Central's Human Resource Department, who stated to refer Plaintiff back to Agency Director who referenced, " that was not Agency Director's responsibility". Plaintiff contacted Agency Director again to be told by Agency Director "it was out of Agency Director's hands and it was the Grant Manager's decision to hire the younger person". Agency Director then suggested Plaintiff call the CSBG Grant Manager, who writes to manage, distribute and makes decisions about the use of Community Services Block Grant (CSBG) funds and program activities. (**Exhibit C-IDHR Fact Finding Statement by Director of CEDA Human Resource Department**).

6. After Plaintiff had suffered through several weeks of emotional stress cause by Defendant CEDA and due to Defendant CEDA actions to terminate Plaintiff who was older than with experience than younger employees retained by Defendant CEDA as cause for this claim.
7. Plaintiff then applied to Defendant, CEDA through CEDA's web site for the available position of Central Intake Specialist. Plaintiff followed the instructions as stated and emailed to forward Plaintiff's resume to CEDA on January 21, 2011 before the close of the posting. (**Exhibit D-Email- Plaintiff Submission of Job Application to CEDA**).

**Continue page 3**

**AGE DISCRIMINATION CAUSE**

8. Plaintiff was born on February 9, 1950 and is within the protected age category of the Illinois Human Rights Act (IHRA)and the Age and Employment Discrimination Act (AEDA)
9. Defendant, CEDA an employer under the Illinois Human Rights employs several hundred employees and is a large multi-social service agency operating in a regional capacity to provide programs and services to individuals and families of suburban Cook County and specific areas of metropolitan Chicago. (See Exhibit- CEDA Agency Annual Profile)
10. Plaintiff was employed by Defendant CEDA from 1989 and held multi positions to include supervision roles until Plaintiff's termination on January 3, 2011 in the position of Program Specialist.
11. Plaintiff, on May 4, 2011, filed formal complaints of age discrimination and retaliation with the Illinois Department of Human Rights (**IDHR**) under the Illinois Human Rights Act 775 ILCS Section 5/1-101 ET. Seq and was assigned a case number **2011CA3266** ; and consequently IDHR forward to case was established the same with **EEOC -21BA11609**. Case filed with IDHR was Case was dismissed on August 8, 2012, for lack of substantial evidence. (**Exhibit E-1 IDHR Charge Letter; Exhibit E-2 EEOC Charge Letter** .
12. Plaintiff on May 4, 2011simoutaineouly filed formal complaints with the Cook County Commission On Human Rights (COHR) case **2011EOO17**of which case is pending final investigation by IDHR). (**Exhibit E-3 Charge Letter/Right to Sue** )
13. Plaintiff later discovered that Defendant, CEDA had retained several younger employees in similar positions as that of Plaintiff and hired an employee younger than Plaintiff for the available position of Central Intake Specialist thus citing differences of performance evaluations over experience and tenure between the younger employee who was retained and Plaintiff was terminated.
14. Defendant, CEDA did not require the younger employee to apply for the job position in the same hiring process as Plaintiff and over 100 additional applicants per the job posting and in accordance with Defendants, CEDA's own personnel policies and hiring practices.
15. Plaintiff now petitions this court's jurisdiction to hear Plaintiff's claim of unlawful age discrimination and retaliation under the Illinois Human Rights Act 775 ILCS Section 5/1-101 ET. Seq., to request relief in the form of reasonable compensation of losses.

Continue page 4

## RETALIATION

- 16 Plaintiff had previously filed a case of retaliation with the Illinois Department of Human Rights in 2003, that which was closed and resolved in discovery and through mediations by IDHR.; of which Plaintiff was within a protected class status.
17. On April 11, 2009, Plaintiff was directed to take a two week unpaid leave of absences for desiring to participate in a civic election. Plaintiff was singled out as an employee while other employees were not. During this period plaintiff began to experience poor performance evaluations from supervisor, Agency Director with direction by the Director of CEDA's Human Resource Department, which was not a practice by Defendant CEDA to have the Human Resource Director to be directly involved with support staff evaluations.
18. On March 26, 2009, Plaintiff initiated letter to CEDA's CEO in compliance due to the lack of response from Human Resource Director and Agency Director as to file a formal grievance of retaliation regarding participation in a civic election to CEDA's Department of Human Resources in March of 2009; it was suppressed with a telephone call from an independent attorney representing, Plaintiff, with a non-satisfactory response from Defendant, CEDA or its agents. (**Exhibit F- Plaintiff 2009 Letter to CEO Re: Mandatory unpaid Leave of Absence.**) .
19. Plaintiffs began to experience severe reductions in the quality of Plaintiff's performance evaluations, in 2009 and 2010 as a result to the above allegations and were treated different than younger employees in similar position with simulated job responsibilities. Plaintiff was unfairly treated and was given more work assignments than was younger employees in similar positions to be performed with outdated and obsolete equipment requiring frequent maintenance.
20. Plaintiff was not given any consideration for the available position of Central Intake Specialist by CEDA or its agents, who was more qualified with greater experience than the younger employee who was hired by CEDA for said position.
21. Defendant, CEDA further gave preference to allow the younger employee hired for the Central Intake Specialist position by granting submission of application to be directly given to Grants Manager. **Reference Item 5. (Exhibit C-IDHR Fact Finding Statement by Director of CEDA Human Resource Department).**

Continue page 5

22. Defendant unfairly failed to retain or offer to promote Plaintiff to other available positions within Dependent CEDA' agency as did Defendant with younger employees working in similar job positions with less experienced,
23. Defendant CEDA willfully and knowingly sought to retain and or transfer several younger employees to available positions after Plaintiff had been terminated by Defendant CEDA.
24. Plaintiff suffered a loss of job, wages, benefits, future retirement and an accumulation prescriptions, and medical expenses for out- patient and hospital stay due to emotional stress.

**DEMAND FOR RELIEF**

Plaintiff now prays for the following:

- A, To prevent Defendant CEDA from further acts of age discrimination against Plaintiff and its employees;
- B. Plaintiff, seeks compensation for damages and claims of loss of job, wages, lost benefits, lost sick and vacation days, and lost retirement benefits.
- C. Plaintiff seeks compensation damages in an appropriate amount designated by this Court
- D, Plaintiff seeks reimbursement of out of pocket prescriptions and medical and expenses for incurred for hospital stay due to emotional stress to include any associated attorney fees and court cost should an attorney be retained to represent Plaintiff in this action.

PLAINTIFF DEMANDS OF TRAIL BY JURY.

Respectfully submitted by Plaintiff

SILLIERINE BENNETT

BY

 11-26-12  
Plaintiff / "PRO SE"

Sillierine Bennett  
1449 Greenwood Avenue  
Ford Heights, Illinois, 60411  
(708) 692-3562

Sillierene Bennett  
US  
CEDA



Community and Economic Development Association of Cook County, Inc.  
208 S. LaSalle Street, Suite 1900, Chicago, Illinois 60604  
312/795-8800 • Fax 312/795-1034  
[www.cedaorg.net](http://www.cedaorg.net)

Exhibit A

## Memo

**To:** Sillierene Bennett  
**From:** Karyn Perkins  
**C:** Pat Doherty-Wildner, Yvonne Butchee, Regina Salazar  
**Date:** January 3, 2011  
**Subject:** CSBG Reduction in Force

For the upcoming program year, beginning January 1, 2011, there will be a change in the funding for the Community Services Block Grant and there will be changes in our service delivery through Ford Heights and the Bloom Rich Community Development Area.

As a result of these changes, your position will be eliminated and your last day of employment with CEDA will be Monday, January 3, 2011. You will be paid through January 14, 2011, in lieu of notice and will receive payment for earned unused vacation pay for the current year.

You will meet with Regina Salazar, Manager, Human Resources to discuss your separation, final pay and benefit options and eligibility and to conduct an exit interview. You will need to return all CEDA property (door keys, cabinet keys, desk keys, ID card, electronic key card, cell phone, computer equipment or any other CEDA property) All of these items can be returned to Regina during that meeting.

You may apply for any open positions that are of interest to you for which you are qualified. You will be considered for the open positions you apply for based on your qualifications for those positions.

CEDA thanks you for your contributions and your time with us. We wish you well in the future.

Please be aware that the Employee Assistance Program remains available to you as a confidential benefit and resource. It is available to former employees and their families to provide help through counseling, training and referral to learn to cope more effectively with any personal problems that may be affecting the individual's work performance. You may contact the EAP confidentially at 1-800)327-5071 and can visit their site at [www.wseap.com](http://www.wseap.com).

#### Employment Opportunities - Central Intake/Referral Specialist

Page 1 of 1

www.ceda.ac.uk | ceda@nerc.ac.uk | webmaster@celldbs.org | CEDA Blog | Follow us:



Community and Economic Development Association of Cook County, Incorporated

*ted* Exhibit B-1

## EMPLOYMENT OPPORTUNITIES

CEDA will only accept resumes and applications for open advertised or listed positions within the time frame indicated for each position. Unsolicited resumes and resumes received after the closing date for a position will not be considered or retained. Applicants must clearly and specifically identify the position for which they are applying. We appreciate your interest in CEDA.

It is the policy of the Community and Economic Development Association, Inc. to implement affirmatively equal opportunity to all qualified employees and applicants for employment without regard to race, creed, color, age, sex, national origin, or physical handicap, and positive action shall be taken to ensure the fulfillment of this policy. Also included in this policy are veterans of the United States military.

**Job Title:** Central Intake/Referral Specialist

PA#:

**Location:** Various CDAs – Suburban Cook County, IL  
(*Chgo. Hights.; Cicero; Evanston; Robbins*)

Department: CSBG (Community Services Block Grant) Program

**Description:**

**Position maintains responsibility for intake, management, referral, follow-up and orientation for all CSBG ARRA program participants. Populations served include individuals in need of employment, housing, senior and disabled emergency relief services, vocational scholarships and REACH services. Responsible for data entry and report generation for ARRA CSBG participants via the Tracker database system. Secondary responsibilities include providing referrals, setting appointments and general orientation for CSBG programs and services (internal and external).**

**Duties:**

Include, but are not limited to, providing intake, assessment and referral for the ARRA CSBG programs at area CDA (Community Development Area); facilitating preliminary eligibility determination including assessment, referral and case management; providing clients with program information and eligibility requirements; assisting new participants to complete all intake paperwork and provide necessary documentation (e.g. SS cards, proof of residency/income etc.); facilitating orientation for program participants regarding program services; conducting data entry and management using the Tracker system; maintaining files and reporting systems as required by CSBG; acting as an informational/referral source for social services and economic development programs offered at CDA; setting appointments with CSBG and other program staff at designated CDA; providing follow-up with departments regarding referrals; facilitating both internal and external audit preparation; providing information for phone inquiries, maintaining a daily log; generating monthly reports to CDA Directors regarding referrals/follow-up; and attending trainings to gain knowledge regarding CEDA's services and eligibility requirements.

**Qualifications:**

High school graduate or equivalent, AA degree or higher preferred. Previous customer service experience required. Computer literate with proficiency with basic Microsoft Office software. Knowledge of and experience with diverse populations. Strong verbal/written communication skills; strong numerical aptitude. Bilingual candidates encouraged to apply.

Closing Date: January 21, 2011

*Interested Applicants should forward resumes to:*



Human Resources Dept.  
HR@ceda.org.net

**CEDA is an Equal Opportunity Employer**

Silvia Bennett  
Select Language  
Powered by Google Translate  
vs CEDA  
Call us: 708-571-0200 | webmaster@ceda.org.net | CEDA Blog | Follow us:  
CEDA



Community and Economic Development Association of Cook County, Incorporated

Exhibit B-2

## EMPLOYMENT OPPORTUNITIES

CEDA will only accept resumes and applications for open advertised or listed positions within the time frame indicated for each position. Unsolicited resumes and resumes received after the closing date for a position will not be considered or retained. Applicants must clearly and specifically identify the position for which they are applying. We appreciate your interest in CEDA.

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Employment Opportunities

Job Title:	PA#:	Location:	Department:	Closing Date:
Central Intake/ Referral Specialist	1101	Various CDAs – Suburban Cook County, IL (Chgo. Hights., Cicero, Evanston, Robbins)	CSBG (Community Services Block Grant) Program	January 21, 2011
Director, Early Childhood Education (ECE)	1102	CEDA Central - Chicago, IL	Children and Family Services – Head Start	January 21, 2011
Teacher Assistant	1103	Ray Walker Head Start – Schaumburg, IL	Children and Family Services – Head Start	January 21, 2011

Witness Statement FormExhibit C  
1-92Re: Charge No.: 11CA 3266Complainant: SILLIERINE BENNETT Respondent:Witness Name: Jake Koepsel EEO Category: 12051Witness Address: A/O R P

Telephone Number: \_\_\_\_\_

Title/position of witness: DIR-NR

(e.g. witness worked with Complainant as a packer on the same assembly line, same shift.)

Interviewed witness by  telephone  in personDate: 8/11/12 Time: 9:45

Location (if in person): \_\_\_\_\_

Indicated below are the relevant facts obtained from above named witness (continued on attached lined paper if more space needed.)

my Dept handles submissions  
 for posted vacancies &  
 generated applicant flow log.

Flow log presents resumes  
 received in HR during posting  
 period. Capture & send log  
 to hiring mgr.

Appears LJ submitted resume  
 directly to Yvonne Butcher  
 Both CP & LA worked in program

DSB

Investigator

#14 Witness Statement 07/08

Date

8/11/12

YB managed. She had knowledge  
 of perf of both. Service delivery

**From:** sillierine bennett (sillbennett@yahoo.com)  
**To:** HR@cedaorg.net;  
**Date:** Fri, January 21, 2011 12:37:02 PM  
**Cc:**  
**Subject:** Employment Opportunity Request

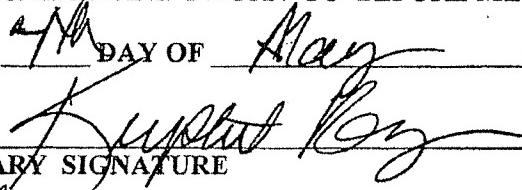
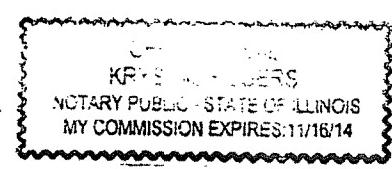
*Exhibit D*

Dear Sir/Madam:

My name is Sillierine Bennett, I am a former employee of CEDA who was recently laid off seeking any position available. I am submitting my resume to apply for the posted postions of Central Intake/Referral Specialist within the CEDA sites listed with a closing dtae of January 21, 2011.

I have attached my resume per the web site instructions.

Thanking you in advance for your sincere consideration.

<b>CHARGE OF DISCRIMINATION</b> This form is affected by the Privacy Act of 1974: See Privacy act statement before completing this form. <b>#11W0504.10</b>		<b>AGEN</b> <input checked="" type="checkbox"/> IDHR <input type="checkbox"/> EEOC	<b>CHARGE NUMBER</b> <b>2011CA3266</b>
<b>Illinois Department of Human Rights and EEOC</b> <i>Exhibit E</i>			
<b>NAME OF COMPLAINANT</b> (indicate Mr. Ms. Mrs.) <b>Ms. Sillierine Bennett</b>		<b>TELEPHONE NUMBER</b> (include area code) <b>(708) 692-3562</b>	
<b>STREET ADDRESS</b> <b>1449 Greenwood</b>		<b>CITY, STATE AND ZIP CODE</b> <b>Ford Heights, IL 60411</b>	
		<b>DATE OF BIRTH</b> <b>02/09/1950</b>	
NAMED IS THE EMPLOYER, LABOR ORGANIZATION, EMPLOYMENT AGENCY, APPRENTICESHIP COMMITTEE, STATE OR LOCAL GOVERNMENT AGENCY WHO DISCRIMINATED AGAINST ME (IF MORE THAN ONE LIST BELOW)			
<b>NAME OF RESPONDENT</b> <b>Community &amp; Economic Development Association d/b/a CEDA</b>		<b>NUMBER OF EMPLOYEES, MEMBERS</b> <b>15+</b>	<b>TELEPHONE NUMBER</b> (include area code) <b>(312) 795-8000</b>
<b>STREET ADDRESS</b> <b>208 S. LaSalle Street, Suite 1900</b>		<b>CITY, STATE AND ZIP CODE</b> <b>Chicago, IL 60604</b>	
		<b>COUNTY</b> <b>Cook</b>	
<b>CAUSE OF DISCRIMINATION BASED ON:</b>		<b>DATE OF DISCRIMINATION</b> EARLIEST (ADEA/EPA) LATEST (ALL)	
<b>Age</b>	<b>Retaliation</b>	<b>Physical Disability</b>	01/03/2011      01/21/2011 <input type="checkbox"/> CONTINUING ACTION
<b>THE PARTICULARS OF THE CHARGE ARE AS FOLLOWS:</b>			
<p><b>I. A. ISSUE/BASIS</b></p> <p><b>LAY OFF – JANUARY 3, 2011, BASED ON MY AGE, 60</b></p> <p><b>B. PRIMA FACIE ALLEGATIONS</b></p> <p class="list-item-l1">1. My age at the time of the alleged harm was 60.</p> <p class="list-item-l1">2. I began my employment with Respondent in 1989. My work performance as CSBG Program Coordinator/Specialist, met Respondent's legitimate expectations.</p>			
Page 1 of 5 I also want this charge filed with the EEOC. I will advise the agencies if I change my address or telephone number and I will cooperate fully with them in the processing of my charge in accordance with their procedures.		<b>SUBSCRIBED AND SWORN TO BEFORE ME</b> THIS <u>4th</u> DAY OF <u>May</u> , 2011  <b>NOTARY SIGNATURE</b>  <b>SIGNATURE OF COMPLAINANT</b> <u>X /</u> <u>Alma S. Bennett</u> <u>5-4-11</u> <b>DATE</b>	
 <b>NOTARY STAMP</b>		I declare under penalty of perjury that the foregoing is true and correct I swear or affirm that I have read the above charge and that it is true to the best of my knowledge, information and belief.	

## EQUAL EMPLOYMENT OPPORTUNITY COMMISSION

*Exhibit E-2*

BENNETT SILLIERINE

Versus

COMMUNITY &amp; ECONOMIC DEVE

PERSON FILING CHARGE BENNETT SILLIERINE	
THIS PERSON (check one)	
<input type="checkbox"/>	CLAIMS TO BE AGGRIEVED
<input type="checkbox"/>	IS FILING ON BEHALF OF ANOTHER
DATE OF ALLEGED VIOLATION	
Earliest	Most Recent
PLACE OF ALLEGED VIOLATION	
EEOC CHARGE NUMBER 21BA11690	
DHR Charge Number 2011CA3266	

## NOTICE OF CHARGE OF DISCRIMINATION IN JURISDICTIONS WHERE A FEP AGENCY WILL INITIALLY PROCESS

(See EEOC "Rules and Regulations" for additional information)

YOU ARE HEREBY NOTIFIED THAT A CHARGE OF EMPLOYMENT DISCRIMINATION UNDER

- Title VII of the Civil Rights Act of 1964       The Americans with Disabilities Act
- The Age Discrimination in Employment Act of 1967 (ADEA)

HAS BEEN RECEIVED BY

The EEOC and sent for initial processing to \_\_\_\_\_ (FEP Agency)

The Illinois Department of Human Rights and sent to the EEOC for dual filing purposes.  
(FEP Agency)

While EEOC has jurisdiction (upon expiration of any deferral requirement if this is a Title VII or ADA charge) to investigate this charge, EEOC may refrain from beginning an investigation and await the issuance of the Agency's final findings and orders. These final findings and orders will be given weight by EEOC in making its own determination as to whether or not reasonable cause exists to believe that the allegations made in the charge are true.

You are therefore encouraged to cooperate fully with the Agency. All facts and evidence provided by you to the Agency in the course of its proceedings will be considered by the Commission when it reviews the Agency's final findings and orders. In many instances the Commission will take no further action, thereby avoiding the necessity of an investigation by both the Agency and the Commission. This likelihood is increased by your cooperation with the Agency.

As a party to the charge, you may request that EEOC review the final decision and order of the above named Agency. For such a request to be honored, you must notify the Commission in writing within 15 days of your receipt of the Agency's final decision and order. If the Agency terminates its proceedings without issuing a final finding and order, you will be contacted further by the Commission. Regardless of whether the Agency or the Commission processes the charge, the Recordkeeping and Non-Retaliation provisions of the statutes as explained in the "EEOC Rules and Regulations" apply.

For further correspondence on this matter, please use the charge number(s) shown.

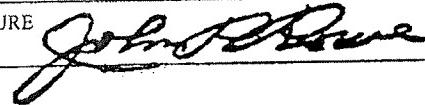
An Equal Pay Act investigation (29 U.S.C. (d)) will be conducted by the Commission concurrently with the Agency's investigation of the charge.

Enclosure: Copy of Charge

## BASIS OF DISCRIMINATION

See Copy of Charge

## CIRCUMSTANCES OF ALLEGED VIOLATION:

DATE May 16, 2011	TYPED NAME/TITLE OF AUTHORIZED EEOC OFFICIAL John P. Rowe, District Director	SIGNATURE 
----------------------	---	---

**STATE OF ILLINOIS  
DEPARTMENT OF HUMAN RIGHTS**

IN THE MATTER OF: )  
Sillierine Bennett )  
Complainant, ) Charge No.: 2011CA3266  
and ) EEOC No.: 21BA11690  
CEDA )  
Respondent. )

## **NOTICE OF ADMINISTRATIVE CLOSURE**

TO: Sillierine Bennett  
1449 Greenwood  
Ford Heights, IL 60411

CEDA  
C/o Joel F. Handler  
Attorney At Law  
55 West Wacker Drive  
Suite 950  
Chicago, IL 60601

Charge Number 2011CA3266 having been filed with the Department of Human Rights by Complainant against Respondent, and Complainant having submitted a written request to withdraw the following parts of this charge pursuant to the Department's Rules and Regulations:

Layoff and failure to rehire on the basis of physical disabilities, Asthma and Carpal Tunnel Syndrome

You are hereby NOTIFIED that Complainant's request to withdraw is approved and that the parts of the charge specified above are hereby administratively closed. The Department will take no further action with regard to these allegations. All remaining allegations shall continue to be processed in accordance with the Department's Rules and Regulations.

ENTERED THIS 12<sup>th</sup> DAY OF March 2012.

## DEPARTMENT OF HUMAN RIGHTS

BY

### **Investigations Supervisor**

PARTCLOS  
07/08

ILLINOIS DEPARTMENT OF  
**Human Rights**

Pat Quinn, Governor  
Rocco J. Claps, Director

Exhibit  
E3

MARCH 31, 2012

SILLIERINE BENNETT  
1449 GREENWOOD  
FORD HEIGH, IL 60411

RE: CHARGE NO.: 2011-CA-3266  
RESPONDENT: COMMUNITY & ECONOMIC DEVE  
COMPLAINT OR CIVIL ACTION FILING DATES: 08/02/12 THROUGH 10/30/12

Dear Complainant,

You have the right to file a complaint with the Human Rights Commission or commence a civil action in the appropriate circuit court, if the Department of Human Rights (DHR) has not completed your case by issuing its report of findings within 365 days from the date you filed your PERFECTED signed and notarized charge or within any extension of that time to which you and the Respondent have agreed in writing.

Within 90 days of the expiration of the 365 days or extension (see above paragraph), if you so choose, you may file a complaint with the Human Rights Commission or commence a civil action in the appropriate circuit court. We have calculated the time above (see Complaint or Civil Action Filing Dates). While we have made this calculation with the best of intentions, errors can occur. The Commission has ruled that it is your responsibility to count the number of days properly. If you file a complaint or commence a civil action in circuit court outside this 90-day period, the Commission may dismiss your complaint; or, your civil action may be deemed untimely.

Once 455 days (or the extended time) have passed, DHR must dismiss your charge with prejudice without any further right to proceed if you have not filed a complaint with the Commission, or commenced a civil action in the appropriate circuit court. Therefore, you may wish to contact an attorney to decide the best way for you to handle your case. If you file a complaint with the Human Rights Commission, the form of the complaint must be in accordance with Section 7A-102(F) of the Human Rights Act. You must serve a copy of the complaint filed with the Human Rights Commission on DHR, on the same day that you file a complaint with the Commission. The Commission will then schedule a hearing for your case before an Administrative Law Judge. If you have any questions about filing a complaint with the Commission, you should call (312) 814-6268 or 814-6269. If you commence a civil action in a circuit court, the form of the complaint must be in accordance with the Illinois Code of Civil Procedure. If you file a complaint with the Human Rights Commission, you may not later commence a civil action in circuit court.

cc: Joel F. Handler, Attorney

1509 HBLTR  
12/2010

Exhibit  
F

Page 2.

prior on March 11, 2009 whom reviewed the village historical election summaries which indicate that historically, such elections have been non-partisan.

I understand that you have also contacted the Cook County Election Clerk to get clarity on the situation. You informed me that you are also awaiting a response from them. Unfortunately, the delays have greatly impacted my ability to seek elective office. I have therefore chosen to continue the unpaid (LOA) and pursue the final stages of the process while a decision is being made in order to avoid even the appearance of impropriety as an Employee of CEDA.

Should you have any other concerns feel free to contact me at my personal e-mail at sillbennett50@sbcglobal.net or my cell phone at (708) 692-3562.

Respectfully Requested,

Sillierine Bennett

Cc: Karyn Perkins, Executive Director, CEDA Bloom-Rich  
Jake Koespel, Director of Human Resources

STAFF IN THE CIRCUIT COURT - 358 COUNTY	
08336-9 Last 01	11/26/2012 10:42AM
ATTY: 99300	016 ALBREARD
AC Docket#:	\$3,000,000.00
FILE #:	2012013254
LAST DATE:	07/06/00 12:00AM
JCE TOTAL:	\$67.00
12 JURORS 3	
Notification	
Document Storage	
1/2 LIBRARY	\$20.00
Refraction	\$3.00
PER PAGING Fee 6	\$24.00
Dispute Resolution	\$1.00
Bank Services	\$25.00
Michigan Waiting Rm	\$10.00
PERE	\$286.00
PERFEE	\$13.00
DISCRETION TOTAL:	\$327.00

CHANCERY DIVISION REQUEST FORM

DATE

9/10/13

NAME

Herb Weaver

PHONE

312-467-9800

ATTORNEY CODE #

90243

CASE #

12 L 13254

MICRO FILM #

IMAGE #

DATE OF ORDER

JUDGE NAME

NUMBER OF CERTIFICATIONS

NUMBER OF PAGES/PHOTO COPIES 18

PRINTOUT

EXEMPLIFICATION

PLACITA

SEARCH FEE

APPELLATE RECORD

TRANSFER

Requested By

To Be Completed By

Completed By

THE HONORABLE DOROTHY BROWN  
CLERK OF THE CIRCUIT COURT  
COOK COUNTY, ILDATE: 9/10/2013 TIME: 4:53PM  
TN: 0008-0001 RN: 00150726  
DIST: 01 DIV: CHANCERY  
CIVL-025 LAWCLERK: JESSICA P. CRAVEN TLR

ATTORNEY NO: 90243

REF CASE NO:  
REF OTHER: 2012L13254CASE TOTAL: \$10.50  
Copy Fee  
CASH  
CHANGERECEIPT 0001 OR 0001  
TRANSACTION TOTAL:\$10.50  
\$10.50  
\$0.00

\$10.50

THANK YOU

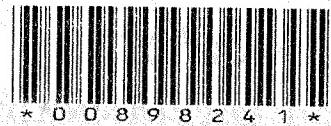
Date \_\_\_\_\_

Date \_\_\_\_\_

Date \_\_\_\_\_

2120 - Served  
 2220 - Not Served  
 2320 - Served By Mail  
 2420 - Served By Publication  
**SUMMONS**

2121 - Served  
 2221 - Not Served  
 2321 - Served By Mail  
 2421 - Served By Publication  
**ALIAS - SUMMONS**



C \* 0 0 8 9 8 2 4 1 \* 58)

**IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS  
 COUNTY DEPARTMENT, \_\_\_\_\_ DIVISION**

(Name all parties)

Sillerine Bennett

Community and Economic Development  
 Association of Cook County (CEADA)  
 20855 Skokie Sh. Suite 1900ff 1400  
 Chicago, IL 60604

**SUMMONS**

2012L013254  
 CALENDAR/ROOM A  
 TIME 00:00  
 PI Stat Misc Action

No. \_\_\_\_\_

Service to be made to  
 Defendant Attorney

Andrew S. Goldberg  
 Lamer, Michlin, Donbrow, Becker, IL  
 Levin and Tominberg LTD.  
 515 N. State Street Suite 2800 Chicago, IL  
 60604

To each Defendant:

YOU ARE SUMMONED and required to file an answer to the complaint in this case, a copy of which is hereto attached, or otherwise file your appearance, and pay the required fee, in the Office of the Clerk of this Court at the following location:

Richard J. Daley Center, 50 W. Washington, Room 801, Chicago, Illinois 60602

District 2 - Skokie  
 5600 Old Orchard Rd.  
 Skokie, IL 60077

District 3 - Rolling Meadows  
 2121 Euclid  
 Rolling Meadows, IL 60008

District 4 - Maywood  
 1500 Maybrook Ave.  
 Maywood, IL 60153

District 5 - Bridgeview  
 10220 S. 76th Ave.  
 Bridgeview, IL 60455

District 6 - Markham  
 16501 S. Kedzie Pkwy.  
 Markham, IL 60426

Child Support  
 28 North Clark St., Room 200  
 Chicago, Illinois 60602

You must file within 30 days after service of this Summons, not counting the day of service.

IF YOU FAIL TO DO SO, A JUDGMENT BY DEFAULT MAY BE ENTERED AGAINST YOU FOR THE RELIEF REQUESTED IN THE COMPLAINT.

To the officer:

This Summons must be returned by the officer or other person to whom it was given for service, with endorsement of service and fees, if any, immediately after service. If service cannot be made, this Summons shall be returned so endorsed. This Summons may not be served later than 30 days after its date.

NOV 26 2012

Atty. No.: Pro Se

WITNESS, \_\_\_\_\_,

Name: Sillerine BennettAtty. for: PlaintiffAddress: 1449 GreenwoodCity/State/Zip: Ford Heights IL 60411Telephone: 708 692-3562

Service by Facsimile Transmission will be accepted at: \_\_\_\_\_

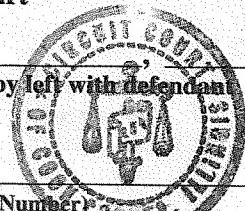
DOROTHY BROWN  
 CLERK OF CIRCUIT COURT

Clerk of Court

Date of service: \_\_\_\_\_

(To be inserted by officer on copy left with defendant  
 or other person)

(Area Code) (Facsimile Telephone Number)



2120 - Served  
 2220 - Not Served  
 2320 - Served By Mail  
 2420 - Served By Publication  
**SUMMONS**

2121 - Served  
 2221 - Not Served  
 2321 - Served By Mail  
 2421 - Served By Publication  
**ALIAS - SUMMONS**



58)

**IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS  
COUNTY DEPARTMENT, \_\_\_\_\_ DIVISION**

(Name all parties)

Sillierine Bennett

Community and Economic Development  
 Association v. Cook County Tax Collector  
 228 S LaSalle St, Suite 1900  
 Chicago, IL 60604

**SUMMONS**

No. \_\_\_\_\_

2012L013254  
 CALENDAR/ROOM A  
 TIME: 00:00  
 PI Stat Misc Action

Service to be made to  
 Defendants' Attorney

Andrew S. Goldberg  
 Lanier, Michlin, Donbrow, Becker  
 Levin and Tomlinberg LTD.  
 515 N State Street Suite 2800, Chicago, IL 60654

**To each Defendant:**

**YOU ARE SUMMONED and required to file an answer to the complaint in this case, a copy of which is hereto attached, or otherwise file your appearance, and pay the required fee, in the Office of the Clerk of this Court at the following location:**

Richard J. Daley Center, 50 W. Washington, Room 801, Chicago, Illinois 60602

- |  |   |   |
|--|---|---|
| <input type="checkbox"/> District 2 - Skokie<br>5600 Old Orchard Rd.<br>Skokie, IL 60077       | <input type="checkbox"/> District 3 - Rolling Meadows<br>2121 Euclid<br>Rolling Meadows, IL 60008 | <input type="checkbox"/> District 4 - Maywood<br>1500 Maybrook Ave.<br>Maywood, IL 60153          |
| <input type="checkbox"/> District 5 - Bridgeview<br>10220 S. 76th Ave.<br>Bridgeview, IL 60455 | <input type="checkbox"/> District 6 - Markham<br>16501 S. Kedzie Pkwy.<br>Markham, IL 60426       | <input type="checkbox"/> Child Support<br>28 North Clark St., Room 200<br>Chicago, Illinois 60602 |

You must file within 30 days after service of this Summons, not counting the day of service.

IF YOU FAIL TO DO SO, A JUDGMENT BY DEFAULT MAY BE ENTERED AGAINST YOU FOR THE RELIEF REQUESTED IN THE COMPLAINT.

**To the officer:**

This Summons must be returned by the officer or other person to whom it was given for service, with endorsement of service and fees, if any, immediately after service. If service cannot be made, this Summons shall be returned so endorsed. This Summons may not be served later than 30 days after its date.

NOV 26 2012

WITNESS, \_\_\_\_\_,

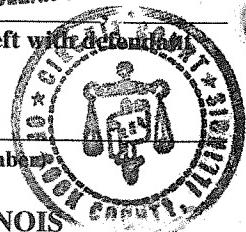
Atty. No.: Pro SeName: Sillierine BennettAtty. for: PlaintiffAddress: 1449 GreenwayCity/State/Zip: Ford Heights IL 60411Telephone: 708 692-3562

Service by Facsimile Transmission will be accepted at: \_\_\_\_\_

Clerk of Court: DOROTHY BROWN  
 CLERK OF CIRCUIT COURT

Date of service: \_\_\_\_\_  
 (To be inserted by officer on copy left with defendant  
 or other person)

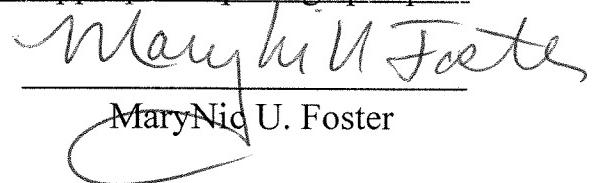
(Area Code) (Facsimile Telephone Number)



DOROTHY BROWN, CLERK OF THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS

## CERTIFICATE OF SERVICE

I, MaryNic U. Foster, of the Cook County Commission on Human Rights, hereby certify that I caused copies of the Cook County Commission on Human Rights Commission Order of Dismissal to be served, on the parties on the attached Service List on January 10, 2013, by United States Mail, appropriate postage pre-paid.



MaryNic U. Foster  
MaryNic U. Foster

## SERVICE LIST

COMPLAINT NO. 2011E017

Sillierine Bennet  
1449 Greenwood  
Ford Heights, IL 60411

Andrew Goldberg  
Laner, Muchin, Dombrow, Becker, Levin & Tominberg, Ltd.  
515 North State St. Ste 2800  
Chicago, IL 60654

IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS  
COUNTY DEPARTMENT-LAW DIVISION

Rev.5/11

SILLERINE BENNETT,  
Plaintiffs  
-v-

NO: 13-1-13264

COMMUNITY AND ECONOMIC DEVELOPMENT,  
Defendants ASSOCIATION (CEAD)

Motion Call "A" Time: \_\_\_\_\_ Line #: \_\_\_\_\_

CASE MANAGEMENT ORDER

\*\*(Please check off all pertinent paragraphs and circle proper party name) \*\*

- (8230)  1. Category #1 (18-mo. discovery) (8232)  1A. Category #2 (28 Mo. Discovery)
- (4231)  2. Written & (f)(1) and (f)(2) discovery to be issued by \_\_\_\_\_ or deemed waived;
- (4296)  3. Written & 213(f)(1) and (2) discovery to be answered by \_\_\_\_\_;
- (4218)  4. Oral discovery & 213(f)(1) and (2) depositions to be completed by \_\_\_\_\_;
- (4288)  5. Subpoenas for treating physicians' deps to be issued by \_\_\_\_\_ or deemed waived;
- (4218)  6. Treating physicians depositions to be completed by \_\_\_\_\_;
- (4206)  7. (Plaintiff) or (Defendant) or (Add. Party) shall answer 213 (f)(3) Interrogatories by \_\_\_\_\_;
- (4218)  8. Plaintiff's 213(f)(3) witnesses' depositions to be completed by \_\_\_\_\_;
- (4218)  9. Defendant's 213(f)(3) witnesses' depositions to be completed by \_\_\_\_\_;
- (4218)  10. Add. party's 213(f)(3) witnesses' depositions to be completed by \_\_\_\_\_;
- (4295)  11. All fact discovery, SCR 213(f)(1) and/or SCR 213(f)(2) discovery is closed. (Circle all applicable)
- (4619)  12. The matter is continued for subsequent Case Management Conference on April 22, 2013 at 10:00 AM in Room 2206 for:

- |  |  |   |
|--|--|---|
| (A) <input checked="" type="checkbox"/> Proper Service | (B) <input checked="" type="checkbox"/> Appearance of Defendants | (C) <input type="checkbox"/> Case Value           |
| (D) <input type="checkbox"/> Pleadings Status          | (E) <input type="checkbox"/> Discovery Status                    | (F) <input type="checkbox"/> Pre-Trial/Settlement |
| (G) <input type="checkbox"/> Mediation Status          | (H) <input type="checkbox"/> Trial Certification                 | (I) <input type="checkbox"/> Other                |
- 
- 
- 

- (4005)  13. Case is DWP'd. (4040)  The case is voluntarily dismissed pursuant to 735 ILCS 5/2-1009.

- (4331)  14. Case stricken from (4284)  Motion Stricken or (4330)  Case stricken from CMC Call Withdrawn from Call Motion Call.

NAME: JAMES N. O'HARA  
ADDRESS: 100 S. WABASH AVE.  
PHONE: 312-334-1242  
ATTY ID#: 75340  
ATTY FOR PARTY: PLAINTIFF

ENTER:

JUDGE

NO.

Judge James N. O'Hara

FEB 20 2013

Circuit Court - 1983

\* COPIES OF ALL PRIOR CMC ORDERS MUST BE BROUGHT TO ALL CMC COURT DATES.  
★ FAILURE OF ANY PARTY TO COMPLY WITH THIS CMC ORDER WILL BE A BASIS FOR SCR 219(C) SANCTIONS. FAILURE OF ANY PARTY TO ENFORCE THIS CMC ORDER WILL CONSTITUTE A WAIVER OF SUCH DISCOVERY BY THAT PARTY.

IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS  
COUNTY DEPARTMENT, LAW DIVISION

SILLIERINE BENNETT,

Plaintiff,

v.

COMMUNITY AND ECONOMIC  
DEVELOPMENT ASSOCIATION OF  
COOK COUNTY,

Defendant.

) Case No. 12 L 13254

FILED - 6  
2013 JAN 22 PM 12:27  
CLERK OF THE CIRCUIT COURT  
LAW DIVISION  
DOROTHY BROWN CLERK

**NOTICE OF MOTION**

TO: Sillierine Bennett  
1449 Greenwood Avenue  
Ford Heights, Illinois 60411

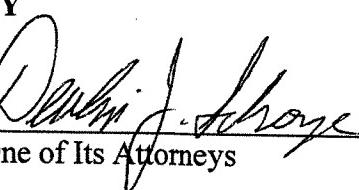
TAKE NOTICE that on January 29, 2013 at 10:00 a.m., undersigned counsel shall appear before the Honorable Judge Obama, Room 2206, Richard J. Daley Center Courthouse, 50 West Washington Avenue, Chicago, Illinois, 60602, and present the attached Defendant's Motion to Quash Service of Summons, a copy of which is attached and served upon you.

Dated: January 22, 2013

Respectfully submitted,

COMMUNITY AND ECONOMIC  
DEVELOPMENT ASSOCIATION OF COOK  
COUNTY

By:

  
One of Its Attorneys

Devlin J. Schoop  
Laner, Muchin, Dombrow,  
Becker, Levin and Tominberg, Ltd.  
515 N. State Street - Suite 2800  
Chicago, Illinois 60654  
(312) 467-9800  
(312) 467-9479 Fax  
Firm I.D. No. 90243

IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS  
COUNTY DEPARTMENT, LAW DIVISION

SILLIERINE BENNETT, )  
Plaintiff, )  
v. ) Case No. 12 L 13254  
COMMUNITY AND ECONOMIC )  
DEVELOPMENT ASSOCIATION OF )  
COOK COUNTY, )  
Defendant. )

2013 JAN 22 PM 12:27  
CLERK OF THE CIRCUIT COURT  
LAW DIVISION  
DOROTHY BROWN CLERK

FILED - 6

**DEFENDANT'S MOTION TO QUASH SERVICE OF SUMMONS**

Defendant, COMMUNITY AND ECONOMIC DEVELOPMENT ASSOCIATION OF COOK COUNTY (“CEDA”), through its counsel, Devlin J. Schoop of Laner Muchin Dombrow Becker Levin and Tominberg, Ltd., pursuant to 735 ILCS 5/2-301(a), moves to quash the Service of Summons in this action, stating as follows:

1. On or about November 26, 2012, Plaintiff filed this action and caused the Clerk of the Court to issue a summons against Andrew S. Goldberg on or about December 28, 2012.
2. Illinois provides that service on private corporations “may be served (1) by leaving a copy of the process with [the corporation’s] registered agent or any officer or agent of the corporation found anywhere in the State; or (2) in any manner now or hereafter permitted by law.” 735 ILCS 5/2-204.
3. As set forth in the Affidavit of Andrew Goldberg, Mr. Goldberg is neither an officer nor registered agent of Defendant, CEDA and, therefore, could not accept service of the Complaint and Summons in this action. (*See* Affidavit of Andrew S. Goldberg, attached as Exhibit A)

4. Because the Court never obtained personal jurisdiction over Defendant, CEDA, the service of process must be quashed and any defaults or ex parte judgments entered against Defendant CEDA are void. *Dec & Aque v. Manning*, 248 Ill. App. 3d 341, 618 N.E.2d 367 (1<sup>st</sup> Dist. 1993); *Bank of Ravenswood v. King*, 70 Ill. App.3d 908, 912, 388 N.E.2d 998, 1001 (1<sup>st</sup> Dist. 1979).

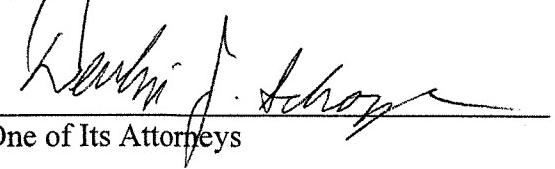
**WHEREFORE**, Defendant CEDA respectfully requests that this Court enter an order:

- A. Quashing the service of the summons and complaint in this matter;
- B. Setting aside and vacating any default order and/or ex parte judgments, if any, against Defendant, CEDA; and
- C. Granting any other relief this Court deems just and proper.

Dated: January 22, 2013

Respectfully submitted,

**COMMUNITY AND ECONOMIC  
DEVELOPMENT ASSOCIATION OF COOK  
COUNTY**

By: 

One of Its Attorneys

Devlin J. Schoop  
Laner, Muchin, Dombrow,  
Becker, Levin and Tominberg, Ltd.  
515 N. State Street - Suite 2800  
Chicago, Illinois 60654  
(312) 467-9800  
(312) 467-9479 Fax  
Firm I.D. No. 90243

**IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS  
COUNTY DEPARTMENT, LAW DIVISION**

SILLIERINE BENNETT, )  
                          )  
                          )  
Plaintiff,            )  
                          )  
                          )  
v.                     )      **Case No. 12 L 13254**  
                          )  
                          )  
COMMUNITY AND ECONOMIC        )  
DEVELOPMENT ASSOCIATION OF     )  
COOK COUNTY,                 )  
                          )  
Defendant.             )  
                          )

**AFFIDAVIT OF ANDREW S. GOLDBERG**

The affiant, if sworn to testify, would testify truthfully as follows:

1. My name is Andrew S. Goldberg. I am a partner in the law firm of Laner Muchin, Ltd.

2. On or about December 28, 2012, the sheriff appeared at my office located at 515 North State Street, Suite 2800, Chicago, Illinois 60654, and served a copy of the Complaint and Summons in the action captioned, Sillierine Bennett v. Community Economic Development Association of Cook County, Inc. (CEDA), Case No. 2012 L 013254.

3. At no time on or prior to December 28, 2012, was I an officer, director and/or registered agent of Defendant, CEDA. I am not authorized to accept service of process on behalf of CEDA.

Under penalties as provided by law under Section 1-109 of the Code of Civil Procedure, the undersigned certifies that the statements set forth in this instrument are true and correct, except as to matters therein to be on information and belief and as to such matters the undersigned certifies as aforesaid that he verily believe the same to be true.

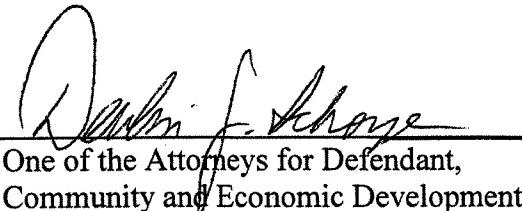
Further Affiant sayeth naught.

  
Andrew S. Goldberg

**CERTIFICATE OF SERVICE**

Devlin J. Schoop, an attorney, hereby certifies that on this 22nd day of January, 2013, he caused **Defendant's Motion to Quash Service of Summons** to be filed with the Clerk of the Circuit Court of Cook County, Illinois, and served on Plaintiff's counsel of record as follows:

Sillierine Bennett  
1449 Greenwood Avenue  
Ford Heights, Illinois 60411

By: 

One of the Attorneys for Defendant,  
Community and Economic Development  
Association of Cook County

STK # THE CIRCUIT COURT - 250X CITY 098969 Last 01 11/26/2012 X54759	ATTN: 95500 016 ALMUSGAR
AMOUNT: \$3,000,000.00	DATE: 07/01/2013
TYPE: DATE: 07/01/2013 12:00AM	SEC TOTAL: \$607.00
12 Mfers 3	\$230.30
Notation	\$15.00
Consign Storage	\$15.00
LIBRARY	\$11.30
REFUND	\$10.00
REG FILING Fee 6	\$10.00
DISPENS Resolution	\$11.00
Print Services	\$25.00
Michigan Waiting Rm	\$10.00
REG	\$26.00
CHARGE	\$13.00
DISPENSATION TOTAL:	\$327.00

CIRCUIT COURT OF COOK COUNTY  
LAW DIVISION - MOTION CALL RECEIPT

CASE NUMBER : 12L013254  
CALENDAR : A  
ATTORNEY : 90243  
P/D : D  
PLAINTIFF NAME : BENNETT SILLIERINE  
DEFENDANT NAME : COMMUNITY ECONOMIC DEVEL

MOTION CALL DATE : 012913 *02/20 @ 10a*  
MOTION CALL SQNO : 006  
MOTION CALL TIME : 10:00AM

---

ADDITION PLEADINGS FILED

- MOTION FILED
- NOTICE OF MOTION
- PROOF OF SERVICE
- EXHIBITS
- AFFIDAVITS
- CERTIFICATES
- MEMORANDUM

COUNTY DEPARTMENT-LAW DIVISIONBENNETT

Plaintiffs

-v-

NO: 12 L 13254

Motion Call "A" Time: \_\_\_\_\_ Line #: \_\_\_\_\_

Defendants

CASE MANAGEMENT ORDER

\*\*(Please check off all pertinent paragraphs and circle proper party name) \*\*

- (8230)  1. Category #1 (18-mo. discovery) (8232)  1A. Category #2 (28 Mo. Discovery)
- (4231)  2. Written & (f)(1) and (f)(2) discovery to be issued by \_\_\_\_\_ or deemed waived;
- (4296)  3. Written & 213(f)(1) and (2) discovery to be answered by \_\_\_\_\_;
- (4218)  4. Oral discovery & 213(f)(1) and (2) depositions to be completed by \_\_\_\_\_;
- (4288)  5. Subpoenas for treating physicians' deps to be issued by \_\_\_\_\_ or deemed waived;
- (4218)  6. Treating physicians depositions to be completed by \_\_\_\_\_;
- (4206)  7. (Plaintiff) or (Defendant) or (Add. Party) shall answer 213 (f)(3) Interrogatories by \_\_\_\_\_;
- (4218)  8. Plaintiff's 213(f)(3) witnesses' depositions to be completed by \_\_\_\_\_;
- (4218)  9. Defendant's 213(f)(3) witnesses' depositions to be completed by \_\_\_\_\_;
- (4218)  10. Add. party's 213(f)(3) witnesses' depositions to be completed by \_\_\_\_\_;
- (4295)  11. All fact discovery, SCR 213(f)(1) and/or SCR 213(f)(2) discovery is closed. (Circle all applicable)

- (4619)  12. The matter is continued for subsequent Case Management Conference on December 12, 2013 at 10:30 AM in Room 2206 for:

- |   |   |   |
|---|---|---|
| <input type="checkbox"/> (A) Proper Service   | <input type="checkbox"/> (B) Appearance of Defendants | <input type="checkbox"/> (C) Case Value           |
| <input type="checkbox"/> (D) Pleadings Status | <input type="checkbox"/> (E) Discovery Status         | <input type="checkbox"/> (F) Pre-Trial/Settlement |
| <input type="checkbox"/> (G) Mediation Status | <input type="checkbox"/> (H) Trial Certification      | <input type="checkbox"/> (I) Other                |

PLAINTIFF IS GIVEN 14 DAYS LEAVE TO FILE AN AMENDED COMPLAINT OR BY 10-25-13  
DEFENDANT IS GIVEN 28 DAYS THEREAFTER TO ANSWER OR OTHERWISE PLEAD  
OR BY NOV. 22, 2013

- (4005)  13. Case is DWP'd. (4040)  The case is voluntarily dismissed pursuant to 735 ILCS 5/2-1009.
- (4331)  14. Case stricken from (4284)  Motion Stricken or (4330)  Case stricken from CMC Call Withdrawn from Call Motion Call.

NAME: Brian PorterADDRESS: 120 W. MADISON #505PHONE: 723-209-6890 P.O. BOX 8527 CHICAGO IL 60680-8527ATTY ID#: 35280ATTY FOR PARTY: PLAINTIFF

ENTER:

JUDGE

Judge James N. O'Hara

NO.

NOTICE:

OCT 11 2013

Circuit Court-1983

★ COPIES OF ALL PRIOR CMC ORDERS MUST  
BE BROUGHT TO ALL CMC COURT DATES.★ FAILURE OF ANY PARTY TO COMPLY WITH  
THIS CMC ORDER WILL BE A RAZIS FOR SCB

ATTY NO. 35380 )  
COUNTY OF COOK ) SS:  
STATE OF ILLINOIS )

**IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS  
COUNTY DEPARTMENT, LAW DIVISION**

SILLIERINE BENNETT, )  
Plaintiff, )  
vs. ) No. 12 L 13254  
Community and Economic )  
Development Association of )  
Cook County, Inc., an Illinois )  
Not-for-Profit Corporation, )  
Defendant. )

**NOTICE OF FILING**

To: Sara Yager  
Laner, Muchin, Dombrow, Becker, Levin and Tominberg, Ltd.  
515 N. State St. – Suite 2800  
Chicago, IL 60654

On October 28, 2013, I will cause to be filed with the Clerk of Court at the Richard J. Daley Center, Chicago, Illinois, Plaintiff's Amended Complaint, a copy of which is attached hereto.

Name:	Brian R. Porter	Attorney for:	Plaintiff
Address:	P.O. Box 8527	City:	Chicago, IL 60680-8527
Telephone:	(773) 209-6890	Atty. No.	35380

**PROOF OF SERVICE**

PLEASE TAKE NOTICE that on October 28, 2013, the undersigned attorney certifies that he served the above-referenced documents on all counsel of record by facsimile transmission, and will deliver a copy on October 28, 2013 in a properly addressed envelope via prepaid U.S. Mail.

/s/Brian R. Porter

DOROTHY BROWN, CLERK OF THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS

ATTY NO. 35380 )  
COUNTY OF COOK ) SS:  
STATE OF ILLINOIS )

**IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS  
COUNTY DEPARTMENT, LAW DIVISION**

SILLIERINE BENNETT, )  
vs. Plaintiff, )  
COMMUNITY AND ECONOMIC )  
DEVELOPMENT ASSOCIATION OF )  
COOK COUNTY, INC., an Illinois )  
Not-for-Profit Corporation, )  
Defendant. )

No. 12 L 13254

**AMENDED COMPLAINT**

NOW COMES plaintiff, SILLIERINE BENNETT, by and through her attorney, Brian R. Porter, to complain of the above-captioned defendant as follows:

***Venue and Jurisdiction:***

1. That this Honorable Court has jurisdiction over this matter pursuant to the 14<sup>th</sup> Amendment of the U.S. Constitution which makes the following provisions applicable to Illinois: 28 U.S.C. Sections 451, 1331, 1343, and 1345; Section 709(f)(1) and (3) of Title VII of the Civil Right Act of 1964; the Age Discrimination Act of 1967; 42 U.S.C. Sections 1981, 1983, 1985, 1988, 2000; and Section 102 of the Civil Rights Act of 1991.
2. That at all times complained-of herein, plaintiff SILLIERINE BENNETT was and is a resident of the county of Cook, state of Illinois.
3. That at all times complained-of herein, defendant COMMUNITY AND ECONOMIC DEVELOPMENT ASSOCIATION OF COOK COUNTY, INC.

(hereinafter referred to as "CEDA") was and is an not-for-profit corporation incorporated in 1966 in the state of Illinois, and having its principal place of business in the county of Cook, state of Illinois.

4. That on August 28, 2012, the plaintiff herein received correspondence from the State of Illinois Department of Human Rights (hereinafter referred to as "IDHR") stating that her IDHR Charge No. 2011CA3266 / EEOC No. 21BA11690, was dismissed for lack of substantial evidence, and that said plaintiff BENNETT could commence a civil action within ninety (90) days, or by November 26, 2012, in the appropriate state circuit court.

5. That in accordance with the aforementioned correspondence referenced in paragraph number 4 above, plaintiff filed a pro se civil action against defendant CEDA on November 26, 2012, in this Honorable Circuit Court of Cook County, Illinois.

***Pertinent Facts Common to All Counts:***

6. That plaintiff was originally hired by defendant in 1971 and served in multiple positions from support staff to supervisory roles of responsibility through 1983.

7. That plaintiff was re-hired by defendant CEDA in January 1989 as a Housing Coordinator to assist and salvage a stressed Housing Counseling Program.

8. That in 2003, plaintiff BENNETT filed a cause with IDHR against defendant CEDA which subsequently was resolved and closed.

9. That for several years throughout the 1990s and 2000s, plaintiff BENNETT served as the duly elected Mayor of Ford Heights, Illinois, a municipal village located in Cook County, Illinois.

10. That plaintiff BENNETT was a mayoral candidate in Ford Heights, Illinois in 2009.

11. That at all times complained-of herein, defendant CEDA was and is a private not-for-profit corporation which receives taxpayer provided government funding from local, state, and federal organizations.

12. That as an employee of defendant CEDA, which is a recipient of taxpayer provided government funding from local, state, and federal organizations, plaintiff BENNETT's aforementioned political activity described above, was considered "protected activity".

13. That in April Of 2009, plaintiff BENNETT was directed by her superiors at defendant CEDA to take a two-week unpaid leave of absence as a direct result of her aforementioned protected political activity.

14. That subsequent to her aforementioned protected political activity, plaintiff BENNETT began receiving downgraded performance appraisals in her work at defendant CEDA as pretext for the retaliation by her superiors for said protected political activity.

15. That on January 3, 2011, plaintiff received a memo from Kathryn Perkins at defendant CEDA which notified plaintiff BENNETT that the very same day of January 3, 2011 itself would be plaintiff's last day of employment with CEDA.

Said memo also stated that plaintiff BENNETT "may apply for any open positions that are of interest to you for which you are qualified".

16. That shortly thereafter, plaintiff was made aware of a job posted on CEDA's website for the position of Central Intake Specialist. The Central Intake Specialist position was to remain open for applications through January 21, 2011.

17. That plaintiff BENNETT was uniquely qualified for the Central Intake Specialist position, as she had previously performed in said position in one of the many roles in which she performed for CEDA during the 34 years of her employment with said defendant.

18. That on or about January 14, 2011, plaintiff BENNETT contacted the CEDA "Agency Director" to inquire about applying for the Central Intake Specialist position, and was told by the defendant CEDA "Agency Director" that "it was the Grant Manager's decision to hire a younger person" for the said position.

19. That plaintiff nonetheless applied for the said Central Intake Specialist position on January 21, 2011, prior to the closing of the application process.

20. That the said Central Intake Specialist position was subsequently awarded to a lesser qualified applicant under the age of 40.

**COUNT I; Age Discrimination**

21. That plaintiff BENNETT repeats, realleges, and incorporates paragraphs 1 through 20 of this Amended Complaint with the same force and effect as though fully stated herein COUNT I, paragraph 21.

22. That throughout her employment with defendant CEDA, plaintiff BENNETT's performance met said defendant's legitimate expectations.
23. That at the time of her January 3, 2011 termination, as well as, at the time of her January 21, 2011 application for the Central Intake Specialist position, plaintiff BENNETT was uniquely qualified to perform said role.
24. That at the time of her January 3, 2011 termination, as well as, at the time of her January 21, 2011 application for the Central Intake Specialist position, plaintiff BENNETT was 60 years of age, which is over the age of 40.
25. That the said Central Intake Specialist position was subsequently awarded to a lesser qualified applicant under the age of 40.
26. That the January 3, 2011 termination of plaintiff from her employment at CEDA, and the January 14, and 21, 2011 refusal to rehire her for a position for which she was uniquely qualified for by CEDA, was a direct and proximate result of her age of 60.
27. That as a direct and proximate result of the aforementioned discriminatory actions by defendant CEDA, plaintiff BENNETT has suffered great economic harm and irreparable damage to her professional reputation.

WHEREFORE plaintiff BENNETT prays that this Honorable Court enter judgment in her favor and against defendant CEDA, for unlawful age discrimination and enter an award in excess of \$50,000.00 for all lost wages, costs, attorneys fees, and all other relief for injuries it deems appropriate.

**COUNT II; Retaliatory Discharge**

28. That plaintiff BENNETT repeats, realleges, and incorporates paragraphs 1 through 20 of this Amended Complaint with the same force and effect as though fully stated herein COUNT II, paragraph 28.
29. That throughout her employment with defendant CEDA, plaintiff BENNETT's performance met said defendant's legitimate expectations.
30. That the downgraded performance appraisals plaintiff began receiving in 2009 for her work at defendant CEDA were pretext for the retaliation by her superiors for her protected political activity discussed supra.
31. That the reasons given for plaintiff BENNETT's two week un-paid suspension in April 2009 by defendant CEDA were pretext for the retaliation by her superiors for her protected political activity discussed supra.
32. That the reasons given for plaintiff BENNETT's January 3, 2011 termination from her employment at CEDA, and the January 21, 2011 refusal to rehire her for a position for which she was uniquely qualified for by CEDA, were pretextual.
33. That plaintiff BENNETT was terminated from her employment with defendant CEDA, and denied an opportunity to be re-hired by said defendant as a direct and proximate result of her protected political activity.

That as a direct and proximate result of the aforementioned prohibited retaliatory actions by defendant CEDA, plaintiff BENNETT has suffered great economic harm and irreparable damage to her professional reputation.

WHEREFORE plaintiff BENNETT prays that this Honorable Court enter judgment in her favor and against defendant CEDA, and enter an award in excess of \$50,000.00 for all lost wages, personal injury, costs, attorneys fees, and all other relief for injuries it deems appropriate.

Respectfully submitted,

By:/s/ Brian R. Porter  
Brian R. Porter  
P.O. Box 8527  
Chicago, Illinois 60680  
(773) 209-6890 phone  
(312) 275-2270 fax  
Attorney for Plaintiff